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**Pro Hac Vice*

Attorneys for Plaintiffs and the Classes

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

RACHAEL NAVARRO, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

JUSTFAB, LLC d/b/a JUSTFAB, a
Delaware limited liability company,

Defendant.

Case No. 2:21-cv-01002-JAM-DMC

**UNOPPOSED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANT JUSTFAB, LLC
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Rachael Navarro ("Navarro" or "Plaintiff"), by and through her counsel, hereby files this Unopposed Motion for Extension of Time for Defendant JustFab, LLC to Respond to Plaintiff's Complaint. Plaintiff respectfully moves the Court for a sixty (60) day extension to **August 30**,

1 **2021** for Defendant JustFab, LLC d/b/a JustFab (“JustFab” or “Plaintiff”) to
2 respond to the Complaint. In support of the motion, Plaintiff states as follows:

3 1. On June 4, 2021, Plaintiff filed a putative class action complaint
4 (“Complaint”) against Defendant. (Dkt. 1.)

5 2. On June 9, 2021, JustFab was served with the Complaint and
6 Summons (dkt. 7), placing its deadline to respond on or before June 30, 2021.

7 3. Counsel for JustFab reached out to Plaintiffs’ counsel, and the parties
8 hereby request an additional sixty (60) days to confer and evaluate the allegations in
9 the Complaint. The additional time will permit counsel for Plaintiff and Defendant
10 sufficient time to review and discuss the matter and their respective positions, and
11 will further permit JustFab sufficient time to review the allegations contained within
12 the Complaint and respond as necessary.

13 4. Good cause exists for this request, and the extension of time requested
14 will not cause prejudice to either Party or the Court. Further, this extension is not
15 sought for dilatory reasons or any other improper purpose, and Plaintiff has not
16 previously sought an extension to the same effect.

17 5. Plaintiff’s counsel has conferred with counsel for Defendant who have
18 consented to the requested sixty (60) day extension.

19 WHEREFORE, Plaintiff Rachael Navarro respectfully requests that the
20 Court enter an order granting the requested extension of time for Defendant to
21 respond to Plaintiff’s Complaint up to and including August 30, 2021, and for any
22 other relief the Court deems necessary and just.

23 Respectfully submitted,

24 Dated: June 30, 2021

RACHAEL NAVARRO, individually and
on behalf of all others similarly situated,

26 By: /s/ Stephen A. Klein

27 UNOPPOSED MOTION FOR EXTENSION OF TIME

One of Plaintiff's Attorneys

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Counsel for Plaintiff and the Putative Class

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2021, a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's CM/ECF system.

/s/ Stephen A. Klein